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15 Attorneys for Defendants  
UBER TECHNOLOGIES, INC.  
16 and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 Plaintiff,

21 v.

22 UBER TECHNOLOGIES, INC.,  
23 OTTOMOTTO LLC; OTTO TRUCKING LLC,

24 Defendant.  
25

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE YANG  
IN SUPPORT OF DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

Date: September 20, 2017

Time: 8:00 a.m.

Ctrm: 8, 19th Floor

Judge: The Honorable William Alsup

Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney with the law firm of Morrison & Foerster LLP. I am a member in  
3 good standing of the Bar of the District of Columbia. I make this declaration based on personal  
4 knowledge and, if called as a witness, I could and would testify competently to the matters set  
5 forth herein. I make this declaration in support of Defendants' Motion for Summary Judgment.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of U.S. Patent  
7 No. 9,368,936.

8 3. Attached hereto as **Exhibit 2** is a true and correct copy of the May 23, 2017  
9 Exhibit C to Waymo's Infringement Contentions.

10 4. Attached hereto as **Exhibit 3** are true and correct excerpts of the August 24, 2017  
11 Expert Report of Dr. Andrew Wolfe, Ph.D.

12 5. Attached hereto as **Exhibit 4** are true and correct excerpts of the August 24, 2017  
13 Expert Report of Michael J. Wagner.

14 6. Attached hereto as **Exhibit 5** are true and correct excerpts of the August 11, 2017  
15 deposition of Andrew Wolfe, Ph.D.

16 7. Attached hereto as **Exhibit 6** is a true and correct copy of the June 21, 2017  
17 Plaintiff Waymo LLC's Supplemental Initial Disclosures.

18 8. Attached hereto as **Exhibit 7** is a true and correct copy of a document marked as  
19 Exhibit 1277 at the deposition of Pierre-Yves Droz.

20 9. Attached hereto as **Exhibit 8** are true and correct excerpts of the August 10, 2017  
21 Plaintiff's Amended Fourth Supplemental Objections and Responses to Uber's First Set of  
22 Interrogatories (Nos. 1-11).

23 10. Attached hereto as **Exhibit 9** is a true and correct excerpts of the March 31, 2017  
24 deposition of Pierre-Yves Droz.

25 11. Attached hereto as **Exhibit 10** are true and correct excerpts of the August 3, 2017  
26 deposition of Pierre-Yves Droz.

27 12. Attached hereto as **Exhibit 11** are true and correct excerpts of the July 12, 2017  
28 deposition of William McCann.



**ATTESTATION OF E-FILED SIGNATURE**

I, Michael A. Jacobs, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: August 31, 2017

/s/ Michael A. Jacobs

MICHAEL A. JACOBS